

QUINN EMANUEL URQUHART & SULLIVAN, LLP

Kevin Teruya (Bar No. 235916)
kevinteruya@quinnemanuel.com
865 South Figueroa Street, 10th Floor
Los Angeles, CA 90017
(213) 443-3000

HAGENS BERMAN SOBOL SHAPIRO LLP

Shana E. Scarlett (Bar No. 217895)
shanas@hbsslaw.com
715 Hearst Avenue, Suite 202
Berkeley, CA 94710
(510) 725-3000

Interim Co-Lead Consumer Class Counsel

[Additional counsel listed on signature page]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

MAXIMILIAN KLEIN, et al.,

Plaintiffs,

vs.

META PLATFORMS, INC.,

Defendant.

Consolidated Case No. 3:20-cv-08570-JD

**CONSUMER PLAINTIFFS' INTERIM
SEALING MOTION TO
PROVISIONALLY FILE CONSUMER
PLAINTIFFS' MOTION TO EXCLUDE
DR. TUCKER'S TESTIMONY UNDER
SEAL**

This Document Relates To: All Actions

The Hon. James Donato

Hearing Date: June 20, 2024

Hearing Time: 10:00 a.m.

1 Pursuant to the Court's March 25, 2024 Order granting the parties' stipulation to modify the
2 sealing procedures applicable to *Daubert* briefing and dispositive motions briefing, Dkt. 745, Consumer
3 Plaintiffs ("Consumers") submit this interim administrative motion to provisionally file under seal
4 Consumers' Motion to Exclude Further Testimony of Dr. Catherine Tucker and Exhibits 1-5 to the
5 Declaration of Shana Scarlett in support of Consumers' Motion. Consistent with the Court's March 25,
6 2024 Order, Consumers will describe the reasons for the requested sealing in a joint Omnibus Sealing
7 Motion covering the dispositive motions briefing, merits *Daubert* briefing, and the joint submission for
8 the merits concurrent expert proceeding 30 days after the last of these documents is filed. In the interim,
9 Consumers respectfully request that the Court provisionally maintain under seal the requested materials.

1 DATED: April 5, 2024

2 By: /s/ Shana Scarlett

3 **HAGENS BERMAN SOBOL SHAPIRO LLP**

4 Shana E. Scarlett (Bar No. 217895)

5 shanas@hbsslaw.com

6 715 Hearst Avenue, Suite 300

7 Berkeley, CA 94710

8 (510) 725-3000

9 Steve W. Berman (admitted *pro hac vice*)

10 steve@hbsslaw.com

11 1301 Second Avenue, Suite 2000

12 Seattle, WA 98101

13 (206) 623-7292

14 *Interim Co-Lead Consumer Class*
15 *Counsel*

16 **LOCKRIDGE GRINDAL NAUEN P.L.L.P.**

17 W. Joseph Bruckner (admitted *pro hac*
18 *vice*)

19 wjbruckner@locklaw.com

20 Robert K. Shelquist (admitted *pro hac*
21 *vice*)

22 rkshelquist@locklaw.com

23 Brian D. Clark (admitted *pro hac vice*)

24 bdclark@locklaw.com

25 Rebecca A. Peterson (Bar No. 241858)

26 rapeterson@locklaw.com

27 Kyle Pozan (admitted *pro hac vice*)

28 kjpozan@locklaw.com

Laura M. Matson (admitted *pro hac vice*)

lmmatson@locklaw.com

100 Washington Avenue South, Suite
2200

Minneapolis, MN 55401

(612) 339-6900

Interim Counsel for the Consumer Class

By: /s/ Kevin Teruya

QUINN EMANUEL URQUHART & SULLIVAN, LLP

Kevin Y. Teruya (Bar No. 235916)

kevinteruya@quinnemanuel.com

Adam B. Wolfson (Bar No. 262125)

adamwolfson@quinnemanuel.com

Scott L. Watson (Bar No. 219147)

scottwatson@quinnemanuel.com

Claire D. Hausman (Bar No. 282091)

clairehausman@quinnemanuel.com

Brantley I. Pepperman (Bar No. 322057)

brantleypepperman@quinnemanuel.com

865 South Figueroa Street, 10th Floor

Los Angeles, CA 90017-2543

(213) 443-3000

Michelle Schmit (admitted *pro hac vice*)

michelleschmit@quinnemanuel.com

191 N. Wacker Drive, Suite 2700

Chicago, IL 60606-1881

(312) 705-7400

Manisha M. Sheth (admitted *pro hac vice*)

manishasheth@quinnemanuel.com

51 Madison Avenue, 22nd Floor

New York, New York 10010

(212) 849-7000

Interim Co-Lead Consumer Class Counsel

ATTESTATION OF SHANA SCARLETT

This document is being filed through the Electronic Case Filing (ECF) system by attorney Shana Scarlett. By her signature, Ms. Scarlett attests that she has obtained concurrence in the filing of this document from each of the attorneys identified on the caption page and in the above signature block.

Dated: April 5, 2024

By /s/ Shana Scarlett
Shana Scarlett